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February 3, 2015

BY FACSIMILE (212-805-7928) and ECF

Honorable Michael H. Dolinger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 17D
New York, New York 10007-1312

Re: *Young-Wolff v. John Wiley & Sons, Inc.*, No. 12-cv-5230 (JPO) (MHD)
Warren v. John Wiley & Sons, Inc., No. 12-cv-5070 (JPO) (MHD)

Dear Judge Dolinger:

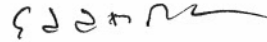
We represent defendant John Wiley & Sons, Inc. ("Wiley") in the above-captioned matters. We are writing further to the requests by your Chambers prior to the settlement conferences held in December 2014 that the parties submit a proposed schedule for the filing of dispositive motions and/or pre-trial orders in these two cases. We have consulted with counsel for the Plaintiffs, and they join in this request.

The parties jointly propose that they inform each other by no later than February 13, 2015 whether they intend to file a motion for summary judgment in one or both cases and the issues on which they intend to seek summary disposition. Assuming that motions will be made in both cases, we further propose that any summary judgment motion be filed on or before March 13, 2015, with oppositions due April 14, 2015 and replies due by April 28, 2015. In the event that neither party files a motion in one or both of these cases, the parties propose that the pre-trial order would be due on April 28, 2015.

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Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ed H. Rosenthal', with a stylized flourish at the end.

Edward H. Rosenthal

cc: Kevin McCulloch, Esq. (via email - kmcculloch@nelsonmcculloch.com)
Danial A. Nelson, Esq. (via email - dnelson@nelsonmcculloch.com)